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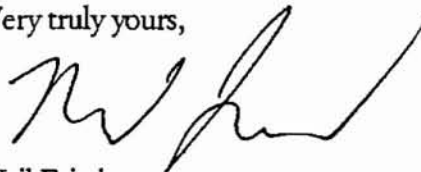
Hon. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
236 Massachusetts Ave., N.E., Suite 110  
Washington, D.C. 20002

Re: Quarterly TTY E911 Report in CC Docket No. 94-102

Dear Ms. Dortch:

Attached please find an original and four copies of Telecommunications Management Group, LLC's most recent TTY E911 quarterly report. I have also filed the report via the FCC's Electronic Comment Filing System and e-mailed a copy to Mindy Littell at [mlittell@fcc.gov](mailto:mlittell@fcc.gov).

Very truly yours,



Neil Fried  
for PAUL, HASTINGS, JANOFSKY & WALKER LLP

cc: Barry J. Ohlson, Chief, Policy Division, Wireless Telecommunications Bureau  
Pam Gregory, Director, Disabilities Rights Office, Consumer & Governmental  
Affairs Bureau

## **TTY Status Report: Third Quarter 2002**

### **Telecommunications Management Group, LLC**

October 15, 2002

#### **Network Infrastructure Software Development**

Telecommunications Management Group, LLC owns and operates a Personal Communications Service (PCS) station in one small Basic Trading Area: Laurel, MS. TMG uses the IS-136 TDMA interface, and its network is supported by a Nortel Wireless 100 (W-100) hybrid wireless and wire line switch. Nortel Networks has no TTY solution for the W-100 switch. To meet TTY requirements, TMG and Nortel Networks have undertaken a project to split the wireless and wire line functionality into two separate switches – a DMS 100 wire line switch and a DMS-MTX wireless switch. Both switches must be in place before the DMS-MTX can be upgraded to the Nortel MTX10 software load required for proper TTY functionality.

Due to the extensive nature of this upgrade, Nortel Networks has informed TMG that it will be unable to complete the upgrade until 4<sup>th</sup> quarter 2002. TMG anticipates completing the switch upgrade by November 16, 2002. Although the software is generally available, Nortel has been focusing its installation efforts on large, nationwide carriers. Nortel has stated it will not complete the extensive software upgrade for TMG before the fourth quarter of 2002. Therefore, TMG filed a one-year waiver with the FCC as it was unable to meet the compliance deadline of June 30, 2002.

#### **Handset Development and Testing Plans**

TMG must rely on handset vendors to provide this solution. TMG is gathering information from handset manufacturers and Nortel in its search for TTY-complaint handsets that Nortel deems compatible with its switch. TMG has so far been unable to find such handsets, but is working with its vendors to acquire handsets as soon as possible.

#### **Beta Testing and Lab Testing**

TMG is in contact with handset manufacturers and with Nortel Networks and will be gathering information on handsets Nortel deems compatible with its switch. Once TMG has this information from Nortel, it will acquire handsets and test for compatibility and quality assurance in its own network.

#### **Release and General Availability to Carriers of Network Infrastructure Software**

Please see Nortel Networks' 2002 Second Quarter Status Report for release and general availability information.

#### **Availability to Carriers of Full Acceptance Test Unit**

TMG expects commitments from Nortel Networks to test the performance of their software solution prior to implementation

#### **Efforts Toward Achieving Digital Wireless Solution Compatibility with Enhanced TTY Devices**

TMG has been working with Nortel to achieve compliance with several regulatory obligations, including TTY and E911 requirements. As stated above, it was determined that the wireless and wireline

functionality of its hybrid switch had to be separated into two distinct switches: a DMS-100 wireline switch and a DMS-MTX wireless switch. Nortel originally told TMG that the switch split would take place in January 2002. That date then slipped to June. In August, Nortel completed the switch split and should be able to complete the switch upgrade by November 16, 2002.

#### **Testing and Deployment Activities**

Once network TTY functionality is installed and TMG has the handsets, TMG will begin testing for compatibility and quality assurance within its own network. Presuming installation of the MTX10 software load takes place by the end of the fourth quarter, TMG plans to test and deploy full TTY functionality in its service area by June 30, 2003.

#### **Carrier Coordination of Testing with PSAP**

TMG has excellent relationships with the PSAP's in its service area and intends to utilize that relationship to assure complete communication functionality between handsets and PSAP's.

#### **Carrier Testing Activities, Including Field Testing, Consumer End-To-End Testing, and other Necessary Tests**

Once handsets have been acquired and network TTY functionality is installed, TMG will begin testing. Testing will involve primarily three groups: TMG engineers and technicians, PSAP representatives, and consumers. The University of Southern Mississippi has an active program assisting hearing-impaired people in this area and is one of many resources that will be utilized as a source of consumer test subjects.

#### **Retail Availability of Necessary Consumer Equipment**

TMG intends to make consumer equipment available through all of its normal retail and direct sales outlets.

#### **Geographic Scope of Network Infrastructure Deployment**

TMG owns and operates a Personal Communications Service (PCS) station in one small Basic Trading Area (BTA) in South Mississippi: Laurel, MS. TMG will deploy the TTY solution within this operating area.

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